

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
(Alexandria Division)**

IN RE THE BOEING COMPANY
SECURITIES LITIGATION

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Case No. 1:24-cv-151-LMB-LRV

DEFENDANTS' UNOPPOSED MOTION TO MODIFY THE DISCOVERY SCHEDULE

Pursuant to Paragraph 13 of the Rule 16(B) Scheduling Order (ECF No. 81), Defendants respectfully submit this Unopposed Motion to Modify the Discovery Schedule (*see* ECF Nos. 81, 113, 146), requesting that the deadline for the completion of all discovery be extended one week from May 9, 2025 to May 16, 2025 in view of the recent one-week continuance of the Final Pretrial Conference from May 15, 2025 to May 22, 2025. The requested one-week extension of the deadline for completion of discovery will assist the parties in completing the depositions in this case, while maintaining the same number of days between the discovery cutoff and the Final Pretrial Conference contemplated by the Court's Rule 16(b) Scheduling Order.

On November 14, 2024, this Court issued its Rule 16(b) Scheduling Order ordering that all discovery should be completed by May 9, 2025 and the final pretrial conference would be conducted on May 15, 2025 (ECF No. 81). On April 7, 2025, the Court continued the Final Pretrial Conference an additional week to May 22, 2025 (ECF No. 152). The parties are diligently working to complete discovery before the current May 9, 2025 cutoff, but due to a scheduling conflict in relation to one deposition of a Boeing executive and the compressed time to take certain expert depositions after expert reply reports are served on May 2, 2025, Defendants requested that Lead Plaintiffs consent to this Motion requesting leave of Court to extend discovery one additional week to May 16, 2025.

Lead Plaintiffs agreed to give such consent. Because the Court has continued the Final Pretrial Conference an additional week, this very minor extension will result in no delay to this proceeding.

WHEREFORE, Defendants request that the Court extend the discovery deadline currently set for May 9, 2025 until May 16, 2025.

Dated: April 11, 2025

Respectfully submitted,

/s/ Benjamin L. Hatch

/s/ Richard C. Pepperman II

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 11th day of April, 2025, I caused a true and correct copy of the foregoing to be filed electronically with the Clerk of Court via the Court's CM/ECF system. Counsel of record are registered CM/ECF users and will be served by the CM/ECF system.

Dated: April 11, 2025

/s/ Benjamin L. Hatch
Benjamin L. Hatch

*Counsel for The Boeing Company, David L.
Calhoun, Dennis A. Muilenburg, Brian J. West, and
Gregory D. Smith*